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September 1, 2022

SUBJECT: DMAVA Review of BPU proposals for wind generated power distribution lines proposed to traverse the Sea Girt National Guard Training Center Mid-Atlantic Offshore Development (MAOD)

FROM: Jill Ann Priar, State Deputy CFMO PRIAR.JILL.A.1264625960

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Date: 2022.09.01 13:11:12 -04'00'

TO: Andrea Hart, BPU State Agreement Approach Project Lead

We appreciated the opportunity to review the package that MAOD submitted to BPU. The DMAVA provides the following comments regarding the impacts and concerns related to use of the National Guard Training Center at Sea Girt in their proposal.

The following DMAVA employees participated in the review: Review participants: Eric Sproesser, Paul Rumberger, Steve Hoffman, Charles Appleby and Jill Ann Priar.

The scope of our review was confined to review of the proposal's impact to the grounds of the National Guard Training Center (NGTC) at Sea Girt. This proposal suggests the use of the [REDACTED]

The following concerns were noted during our review:

The overall proposal involves the placement of underground manholes and distribution lines on the grounds of the National Guard Training Center (NGTC) at Sea Girt. The concept of placing underground infrastructure on the grounds is supportable, however further development and adjustments to their proposal would need to be made. The following items were noted during our review:

- 1) The proposed route for the installation of the cables may need to be adjusted somewhat to avoid impacts to onsite wetlands and infrastructure items. This is not considered to be a show stopper, but more of an observation.
- 2) A construction laydown area was not identified on the KMZ files provided but expected to be a requirement. Use of an area for this purpose will need to result in no disruption to the activities on the NGTC. The details will vary based on time of year that the work occurs.
- 3) The actual work for the installation of the infrastructure would need to occur during a period that would not negatively impact the NGTC missions or endangered species at the NGTC. Activities in proximity to the beach are restricted during the nesting period (15 Mar – 15 Aug) and through Labor Day each year.
- 4) Given the relationship that MAOD has with Atlantic Shores Off Shore Wind (ASOW) there may be an opportunity to avoid multiple construction efforts on the ground in support of the off shore wind projects. ASOW is stated as a partner with MAOD. ASOW is currently in discussions with DMAVA regarding the proposed installation of underground infrastructure to deliver power from ASOW's project to generate and

distribute wind generated power. If ASOW and MAOD partner in the early stages, which appears to be occurring, disruptions to the NGTC missions could be minimized. The infrastructure placed by either entity could be sized to accommodate the other, thereby avoiding the need to trench and do earth work multiple times. Minimizing the number of times heavy construction must at the site also reduces negative impacts to the environment and endangered species.

- 5) A long-term easement and temporary construction easement package would need to be submitted, processed and finalized before construction start.

The MAOD proposal is believed to be supportable by DMAVA and the NGTC. Some minor adjustments to their proposal may be required to avoid impacts to the infrastructure, missions, endangered species and environmentally sensitive areas.

Of the three proposals reviewed by DMAVA that propose use of the NGTC the MAOD proposal presents the least amount of negative impacts to the site.